

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products  
Liability Litigation

No. MDL 15-02641-PHX-DGC

**QUALIFIED PROTECTIVE ORDER**

The individuals listed on attached Exhibit A have asserted claims against defendants in the above captioned action. These individuals have retained Counsel to represent them in relation to the above-captioned action. Counsel agrees that they represent the individuals identified in Exhibit A.

**IT IS HEREBY ORDERED AS FOLLOWS:**

1. By virtue of their status as Counsel for the individuals listed on Exhibit A, Counsel shall resolve any potential Part A and/or Part B fee-for-service Medicare Secondary Payer (MSP) claim(s) related to settlements, judgments, awards, or other payments associated with the above captioned action for those individuals on Exhibit A who are or were Medicare beneficiaries.
2. Counsel has also retained ARCHER Systems, LLC ("ARCHER") to identify and resolve potential healthcare liens with Medicaid agencies, TRICARE, Veteran's Administration, Department of Defense, Indian Health Services, and private health

1 insurers, (hereinafter, collectively “the Agencies”) claim(s) related to settlements,  
2 judgments, awards, or other payments associated with the above captioned action  
3 for those individuals on Exhibit A who are or were beneficiaries of the Agencies.

- 4 3. The entry of this HIPAA-compliant qualified protective order is necessary in this  
5 action in order to permit the Agencies to transmit lists of information, including  
6 protected health information and other related information regarding the  
7 individuals listed on Exhibit A to ARCHER, rather than providing copies of  
8 individual HIPAA authorizations and information on a claimant-by-claimant basis,  
9 including any third party authorized by ARCHER or the Court to assist in the  
10 resolution of the Agencies’ potential liens and reimbursement claims.  
11

- 12 4. As such, it is hereby ordered:  
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- 14 a. This Qualified Protective Order shall apply to all “protected health  
15 information” and “individually identifiable health information,” as defined by  
16 45 CFR § 160.103, or information that is otherwise protected from disclosure  
17 by the Privacy Act, 5 U.S.C. § 551a, the Health Insurance Portability and  
18 Accountability Act of 1996, Pub. L. 104-191, 42 CFR § 431 Subpart F, titled  
19 “Safeguarding Information on Applicants and Recipients” and other  
20 applicable state law, created, received or collected from plaintiffs and  
21 claimants by the Agencies, including, but not limited to: (a) names and  
22 addresses, dates of birth, social security numbers, identification numbers and  
23 other demographic information that identifies, or could be used to identify the  
24 individuals listed on Exhibit A; (b) eligibility and entitlement information for  
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1 the individuals listed on Exhibit A; (c) claims information relating to the past,  
2 present, or future health care of the individuals listed on Exhibit A; (d) claims  
3 information relating to the provision of healthcare to the individuals listed on  
4 Exhibit A; and, (e) claims information relating to the past, present, or future  
5 payment for the provision of healthcare to the individuals listed on Exhibit A.  
6

7 b. Each Agency is hereby authorized and directed to transmit to ARCHER to  
8 assist in the resolution of potential liens or reimbursement claims, any  
9 information, including claims information and other protected health  
10 information, for those individuals listed on Exhibit A against whom they may  
11 assert liens or reimbursement claims.  
12

13 c. ARCHER shall not use or disclose any protected health information or  
14 individually identifiable health information subject to this Qualified  
15 Protective Order for any purpose other than this litigation, including  
16 compliance with any applicable Court orders or other legal obligations.  
17 Similarly, the Agencies shall only use the information listed on Exhibit A for  
18 the specific purposes of transmitting to ARCHER any information, including  
19 claims information and other protected health information, for those  
20 individuals listed on Exhibit A in the above-captioned matter against whom  
21 the Agencies have asserted liens or reimbursement claims, or in whose  
22 potential settlements the Agencies may have an interest. The Agencies shall  
23 only make the information for the individuals listed on Exhibit A available to  
24 those within their respective Agency who need access to the information for  
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1 the individuals listed on Exhibit A for the specific purpose stated in this  
2 paragraph. If the Agency utilizes outside vendors or companies to perform  
3 part or all of their tort recovery practices, the outside vendors or companies  
4 shall be expressly bound by all terms and conditions of this Qualified  
5 Protective Order.  
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- 7 d. ARCHER shall maintain any protected health information or individually  
8 identifiable health information subject to this Qualified Protective Order in a  
9 secure and safe area and shall exercise the same standard of due and proper  
10 care with respect to the storage, custody, use and/or dissemination of such  
11 protected health information as is exercised by ARCHER with respect to its  
12 own confidential proprietary information.  
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15 **IT SO ORDERED.**

16 Dated this \_\_\_\_ day of \_\_\_\_\_, 2021.  
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**EXHIBIT A**

Last Name	First Name
Abdullah	Shariese
Akin	William L.
Aleman	Christina
Alexander-Hamm	Denita
Allen	Kelly L.
Allen	Marchita
Allred	Dewayne
Anderson	Lisa
Andorfer	Christina L.
Andrews Jr.	Charles
Anttila	Eileen A.
Arneth	Robert
Arnett	Connie
Ault	Jerra N.
Aumiller	Lyndol
Bacon	Carolyn
Baker	Shontelle
Bandor	Lori B.
Bankston	James
Barker	Nathan (Peggy)
Barlow	James
Barnett	Jamaal M.
Barr	Richard D.
Barrett	Gayle
Barrow	Dorothy
Bartholomew	Tomaicha
Bartilet	Brandon
Bass	Betty A.
Bates	Stephen L.
Batiste	Dorothey
Bayait	Bonnie G.
Bayton	Brandy T.
Beachum	Ronnie L.
Bean	Catherine
Beasley	Ronnie L.
Bell	Charles R.

Last Name	First Name
Bennett	George T.
Berkes	Peter
Bernhard	Christopher
Bestor	Patricia
Bingell	Henry
Bingham	Jerry
Bishop	Janice
Blackburn	Boyd K.
Bland	Frank
Bobenage-Pope	Wendy
Boehringer	Michelle
Bonner	Janet R.
Bowick	Willis
Box	Charles
Bradburn	James
Bradford	Shirley
Bradley	James F.
Brehob	Norman M.
Brigandi	Jean C.
Brooks	Barbara A.
Brooks	Gary
Brothers	William T.
Brown	Harold
Brown	Jimmy
Brown	Joy
Brown	James
Brown	James E.
Bryan	George
Burleson	Virginia A.
Burton	Kennith D.
Bush	Teresa
Bush	Donna M.
Byrd	Johnnie L.
Caballero	Alejandro
Campbell	Charles
Campos Eibeck	Catalina
Canada	Barbara
Carr	Jamie

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Last Name	First Name
Carroll	Teresa
Carroll	Brett C.
Carusone	Joseph R.
Casey	Robert
Castleberry	Stefanie D.
Cater	Evelyn
Chambers	James
Chavarri	Ruth
Childers	Sheila K.
Christiansen	Martha
Christoff	Michael
Christopher	Bradley R.
Churchwell	Melissa
Clay	Henry J.
Clifton	Sandra
Clinger	Carson R.
Cofresi	Jose A.
Coker	Beverly N.
Cole	Jane
Cole	Lynn
Cole	Marcus D.
Cole	Jacqueline
Collier	Sabrina
Collins	Darnell G.
Colvin (Bradford )	Melissa H.
Connell	Margie M.
Conrad	William J.
Cook	James E
Cook	Joshua
Cook	Ronald W.
Cooper	William
Copeland-Brumfield	Sonja L.
Cramer	Justin M.
Cramer	Marie R.
Crane	Stanley
Crawford	Faith
Crisp	Noelle
Crump	David E.

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Last Name	First Name
Culbertson	Harry A.
Culbertson	Sharon T.
Cullen	Randall F.
Dabbs	Richard
Davis	Fenton R.
Davis	Joey
Davis	Seth
Davis	Tyra
Davis	Jackie
De La Cruz	Jacob
Deblock	Sharon L.
Denson	Dennis
Dercher	Vicki L.
Dessureau	Dawn M.
Dickson	James R.
Dillard	Marva
Dillon	Dennis J.
Dillon	Gregg
Dixon	Naomi
Dixon	Suzette
Downs	Kathryn
Drake	Teresa
Drury	Richard
Duran	Melissa
Eastridge	Tabitha I.
Edwards	Richard S.
Elsenheimer	Larry L.
Emmons	Callie A.
English	Jose A.
Etters	John
Evans	John S.
Fagotti	Mark
Fairhurst	Grace M.
Fancher	James D.
Farley	Angela
Farley	Sandra J.
Farlow	Ursula
Fausnaugh	Carol A.



Last Name	First Name
Felschow	Mark
Fine	Donald
Fine	Susan P.
Floyd	Anthony
Ford	Dianne
Foss	John
Fox	Samuel E.
Franks	Nadine S.
Fretz	David W.
Froehlich	Dodi
Fuller	Christopher M.
Fulton	Joshua
Gaitan	Crystal
Gallow	Joseph
Garrison	David
Ghan	Karen
Gibson-Mason	Cynthia
Giess	Jan J.
Gill	Michael
Gilliam	Patricia R.
Gipson	Timothy
Gipson	Stuart A
Godley	April
Goldmacher	Joel S.
Gonzalez	Juan F.
Gordon	Karen L.
Gosenheimer	Albert
Graham	Cary
Gray	Michele
Greaver	Tara
Green	Roger D.
Greene	Taylor
Gresham	Vernon
Griffin	Jerry L.
Gunter	Barbara
Haffner	Elsie M.
Hagans	Monica M.
Hall	James

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Last Name	First Name
Halle	Deborah
Halstead	Brett A.
Hamby	Constance
Hamilton	Lana R.
Hamm	Tony
Hanley	Danielle K.
Hans	Susan
Hardin	Daniel P.
Harris	Angela J.
Harris	Eunice
Harris	William B.
Harrison	Floria
Hart	Randell L.
Hauck	Jo A.
Havner	Lisha A.
Haywood	Steve L.
Head	Barron
Heape	Tammy M.
Heard	Tracey
Heitzler	Robert
Heitzman	James
Henderson	Wesley
Henle	Camela M.
Hepburn	Antwin
Hernandez	Ann
Hernandez	Beatrice
Herrera	Adolph
Herron	Gregory
Hess	Raymond P.
Hewitt	Terry L.
Hickey	Brian
High	Sharon C.
Highers	Suellen
Hight	Amanda
Himes	Danielle
Hines	Robert G.
Hinze	Wilbert
Hitch	Amy

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Last Name	First Name
Hodgson	Charles
Hogan	John A.
Holliday	April
Horn	Derrick
Houle	Lawrence
Houston	Mary E.
Hrnciar	Lynn M.
Hudson	Carol
Hughes	Brittany N.
Hurley	Larry J.
Hurston	Weldon
Jachimiak	Brittany
Jackman	David
Jackson	Carolyn
Jackson	Patrice
Jackson	William
Jackson	Lajuana
Jackson-Hogg	Kayla
Jacobs	Angenette
Jacobucci	Donna
Jakubowski	Justine
Jefferson	Melinda
Jefferson	Sheri L.
Jenkins	Michael
Jenkins	Tasha N.
Jenkins	Bridgette
Johnson	Brenda J.
Johnson	Cherieamour
Johnson	Joshua
Johnson	Paige
Johnson	Roy J.
Johnson	Willie J.
Johnson	Leroy
Johnson Hansen	Jackilyn
Johnston	Ruth A.
Jones	Akeemia
Jones	Arnold L.
Jones	Carolyn

Last Name	First Name
Juaire	Duwayne
Justice	Diania
Kapp	Mark J.
Kar	Michael P.
Keen	Harry
Keene	Cynthia
Kennedy	Gwendolyn
Kettell	Craig A.
Keyes	Donald L.
Kilpatrick	Billie L.
Kingston	Victoria
Kirby	Keyawna Y.
Kirkpatrick	Brian J.
Knatt	Andrea
Kubik	Dianna
LaFlesh	Tia
LaLonde	Judy
Landry	Kenneth L.
Latimore	Bonnie
Latorra-Lutz	Shawn
Laurie	Margaret
Lavimodiere	Jason E.
Lawson	Judy
LeBlanc	Richard J.
Little	Brenda
Little	Alphonso
Lloyd	John
Lockwood	Melanie J.
Long	Debra
Lozoya	Laura
Lucero	Debbie
Lumley	Michael
Lusk	Rhonda L.
Lutness	Jo C.
Lynch	Felicia K.
Lyons	Wayne
MacDonald	Zachary
Macias	Magdalena

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Last Name	First Name
Macrie	Peter
Mahoney	Erin S.
Maqueda	Daisy
Marcello	August
Martin	Alisha
Martin	Rodger B.
Mason	Michael G.
Matteson	Angelia
Maxwell	Emma L.
Maye	Johnnie
McCarty	Karen J.
McCowan	Rodney
McCown	Randall
McCutcheon	Terry R.
McDaniel	Susan
McDonald	Robert R.
McDowell	Cynthia
McFadden	Zachry
McGillivray	Stacey
McIntosh	Thomas
Mcintyre	Edward
Meaux	Alan
Medlin	Richard
Meredith	James
Merten	Philip
Michalski	Peter
Miller	James
Miller	Ryan
Moffatt	Arthur
Montgomery	Tammy
Mooney	Kelly
Moore	John
Moore	Michael
Moore	Angela
Moore	Jenny
Morales	Ivette
Morey-Howard	Ruby
Morris	Michelle

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Last Name	First Name
Morris	Ronald L., Jr.
Mozgai	Richard
Murray	Carolyn
Muschaweck	Judith
Muszynski	Lyle
Mutispaugh	Kenneth
Natcher	Cyril
Navarette	Jayne
Nevings	Connie
Nezbeay	Erwin
Nichols	John
Norquest	Jan
Norwood	John
OBrien	Eileen
O'Brien	Janelle
Orgill	Virginia
Orlando	Michael
Ortega	Cathleen
Ortiz	Esteban
Owens	Ira
Parker	Erica
Parker	Jessica
Parr	Carl
Payne	Claudia
Peccatiello	Kenneth
Pierce	Toni
Pippins	Linda T.
Platt	Nancy
Pliske	Vernell E.
Plott	Virginia
Poplawski	Amy
Price	Franklin C.
Quintero	Tania
Quisenberry	Sandra
Radjewski	Farah
Rainey	Sarah
Register	Kathryn
Reynolds	Bruce

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Last Name	First Name
Reynolds-McDonnell	Theresa
Rhodes	Wanda
Rice	Leonard
Rice	Susan
Richardson	Rubie
Riggs	Barbara
Rivera	Daniel
Rizo	Maria
Robertson	Irris
Robinson	Billy
Robinson	Emily
Robinson	Kevin
Rodriguez	Raquel
Roldan	Kenya
Roma	Samuel
Rosa	Niko
Rosales	Jose
Ross	Andre L.
Rowe	Donald
Rudy	William
Ruiz	Elena
Rushing	Tyrone
Ryan	Angela
Ryan	Kerry
Sailer	Christina
Salazar	Francisca
Sanchez	Mary
Sanchez	Jacqueline M.
Sargeant	Gary
Schaffer	Marvin
Scholten	Debra A.
Schrader	Corey E.
Scott	April
Scott	Karen A.
Seek	Marvin E.
Sellers	Nelda S.
Sharpe	Joseph
Shaw	Gary R.

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Last Name	First Name
Sheetz	Dennis H.
Sheetz	Mary
Shelton	Stewart (Misty)
Sims	Stephen
Sizemore	Brian C.
Skelton	Susie M.
Slaughter	Mary
Smith	Carolyn
Smith	Glenda
Smith	Nannette
Smith	Ray
Smith	Lowell
Sosa	Serafin R.
Spaulding	Annette
Spradling	Leo W.
Spradling	Randall
Spratt	Shawn D.
Spring	Thomas
Staats	Karen M.
Stafford	Elizabeth J.
Starrett	Mose G.
Stegall	Cheryl
Stephenson	Richard S.
Still	Tommie H.
Stukins	Gary D.
Suttle	Jossie
Sweeney	David S.
Sweetland	Donna M.
Swords	Helen
Szumowski	Joseph H.
Tatro	Yvonne M.
Taylor	Charlotte
Taylor	Colette
Taylor	James P.
Taylor	Rosato
Thaxton	Chris E.
Thigpen	Melanie J.
Thomas	Michael



Last Name	First Name
Thomas	Roshunda T.
Thomas-Brooks	Shannon
Thompkins	Richard
Thompson	Charles
Thompson	Janet L.
Tisdale	Davin
Toliver	Joyce
Tomanelli	Lynne
Trotter	Angela
Tucker	Rakisha S.
Turner	Eugene
Turner	Michael
Turner	Tammie
Tyler-Neal	Tonya M.
Tysinger	Crystal H.
Umphreys	Thomas
Uphaus	Leslie
Uren	Myra O.
Vanbiber	John C.
Varney	Donnie
Velasquez	Katherine
Velazquez	Desiree
Venosh	John
Vinson	Julie
Wafle	Janet
Walker	Willie J.
Walley	Zaquan
Walton	Cynthia D.
Ward	Lachelle
Warren	Carolyn
Warren	Wayne
Watts	Charles
Weakley	Brenda E.
Webb	Phillip H.
Welford	Kemon
Wentzel	John
Westbrook	Patricia
Westerfield	Alexis S.

Last Name	First Name
Wetowitz	Stephen
White	Lester L.
Wick	Duane
Wilburn	Kimberlee
Wiley	Martha G.
Wilkins	Tonay
Williams	Carrihuna
Williams	Edward R.
Williams	Marschette
Williams	Charles R.
Williams	Gatson J.
Wilson	Bernard A.
Wilson	Teddy N.
Wilson	Teresa G.
Womack	Danielle E.
Wondimagegnehu	Carroll V.
Woodson	Karan
Wooten	Danny R.
Wright	Felice D.
Wurtmann	Abby
Yates	Donald
Young	Carla J.
Young	Youdoran
Zehnder	Nash
Zeigler	Julianna
Zybert	Freedom